



SEEGERWEISS_{LLP}

77 Water Street, New York, NY 10005 P 212.584.0700 F 212.584.0799 www.seegerweiss.com

November 3, 2017

Via ECF and Hand Delivery

Honorable Anita B. Brody
United States District Judge
Eastern District of Pennsylvania
601 Market Street
Room 7613
Philadelphia, PA 19106

Re: In Re: National Football League Players' Concussion Injury Litigation,
No. 2:12-md-02323-AB

Dear Judge Brody:

I write in response to the letter to the Court from counsel for Thrivest, Brian Berkley, dated October 30, 2017 [ECF No. 8876]. Mr. Berkley requested a ten-day extension, until November 16, 2017, to respond to the motion filed by Co-Lead Class Counsel on October 23, 2017 [ECF No. 8470], seeking an order directing the Claims Administrator to withhold any portions of Class Member monetary awards purportedly owed to certain third-party lenders and claims services providers and directing disclosure to the Claims Administrator of the existence of all third-party agreements with Class Members. The Court granted the request by Order of November 2, 2017, directing that any response to the motion be filed on or before November 16, 2017 [ECF No. 8879].

One of the non-parties, Legacy Pro Sports, already has filed a response to the motion on October 31, 2017 [ECF No. 8825]. Co-Lead Class Counsel would prefer to file a single omnibus reply in further support of the motion, rather than filing piecemeal replies. Seemingly, piecemeal replies will be required given Legacy Pro Sports' already-filed opposition, the intended response of Thrivest, and the possibility (if not likelihood) of other responses either on or before November 16, 2017.

Accordingly, we respectfully request that the Court allow Co-Lead Class Counsel until November 30, 2017 to file an omnibus reply. A proposed Order is submitted herewith.

New York

Newark

Philadelphia

We thank the Court for its consideration of this matter.

Respectfully,

/s/ Christopher A. Seeger

Christopher A. Seeger
SEEGER WEISS LLP

Co-Lead Class Counsel

Encl.

cc: All counsel of record (via ECF)
Counsel for respondent third parties not currently on ECF (via email)

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

[PROPOSED] ORDER

AND NOW, this ____ day of November, 2017, upon consideration of Co-Lead Class Counsel's letter requesting an extension to facilitate the filing of an omnibus reply in further support of Co-Lead Class Counsel's Motion to (1) Direct Claims Administrator to Withhold Any Portions of Class Member Monetary Awards Purportedly Owed to Certain Third-Party Lenders and Claims Services Providers, and (2) Direct Disclosure to the Claims Administrator of Existence of Class Member Agreements with All Third Parties,

IT IS ORDERED that Co-Lead Class Counsel's omnibus reply shall be filed on or before November 30, 2017.

Anita B. Brody
United States District Judge